UNITED STATES DISTRICT CURT SOUTHERN DISTRICT OF NEW YORK

N 5444

SNELL MEMORIAL FOUNDATION, INC.

Plaintiff,

IRON HORSE VELMETS, INC., HELVIETS, INC. and JORIAN TOUND SOBER (ak. Todd Sobel"),

U.S.D.C. S.D. N.Y.

Case No.

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff, Snell Memorial Foundation, Inc. ("Plaintiff" or "SMF"), by its undersigned attorneys, as and for its Complaint against Defendants, Iron Horse Helmets, Inc. ("Iron Horse"), Helmets, Inc. and Jordan Todd Sobel ("Sobel") (collectively, "Defendants"), alleges upon personal knowledge as to its own acts and to events taking place in its presence and upon information and belief as to all other facts as follows:

NATURE OF THIS ACTION

This is an action for trademark infringement, cybersquatting, trademark dilution, unfair competition, and deceptive acts and practices arising from Defendants' willful infringement of SMF's registered certification mark (the "Infringing Mark") and bad faith use and registration of a domain name (the "Infringing Domain Name") that is identical to SMF's registered mark.

Defendants' use of the Infringing Mark and Infringing Domain Name in connection with the sale and promotion of helmet products constitutes a clear attempt to harm SMF and dilute the distinctiveness of SMF's marks.

THE PARTIES

- Snell Memorial Foundation, Inc. is a California not-for-profit corporation with a 1. principal place of business at 3628 Madison Avenue, North Highlands, California 95660.
- 2. Iron Horse Helmets, Inc. is an Alabama corporation with a principal place of business at 3625 1st Avenue South, Birmingham, Alabama 35222.
- 3. Helmets, Inc. is an Alabama corporation with a principal place of business at 3625 1st Avenue South, Birmingham, Alabama 35222.
- 4. Jordan Todd Sobel a/k/a Todd Sobel is an individual residing in the state of Alabama. Upon information and belief, Sobel is the President of Iron Horse Helmets, Inc. and Helmets, Inc. Upon information and belief, Sobel directed, controlled, ratified, participated in and was the moving, conscious and driving force behind all of the acts complained of herein.

JURISDICTION AND VENUE

- 5. This Court has jurisdiction over the subject matter of the First through Third Claims for Relief of this Complaint pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331, 1338(a) and (b) since these claims arise under the Trademark Laws of the United States.
- 6. This Court has jurisdiction over the Fourth through Sixth Claims for Relief of this Complaint pursuant to 28 U.S.C. §§ 1338(b) and 1367 since these claims are joined with substantial and related claims under the Trademark Laws of the United States, 15 U.S.C. § 1051 et. seq., and since the claims are so related to the federal claims that they form part of the same case and controversy.
- 7. The Court also has supplemental jurisdiction over the pendent state law claims pursuant to 29 U.S.C. § 1367(a).

- 8. The Court has personal jurisdiction over Iron Horse, Helmets, Inc. and Sobel since Iron Horse, Helmets, Inc. and Sobel are doing business within this State and judicial district, transact business with this State and judicial district, derive substantial revenue from intra-state and inter-state commerce, have committed acts of infringement within this State and judicial district, and are otherwise within the jurisdiction of this Court.
- 9. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and (c) because a substantial part of the events giving rise to the claims occurred in this district and since Defendants are subject to personal jurisdiction in this judicial district.

FACTS COMMON TO ALL CLAIMS

- 10. SMF was formed in 1957 by a group of scientists, physicians, racing colleagues and friends who teamed together in a dedicated effort to promote research, education, testing and development of standards geared to improve the effectiveness of safety helmets.
- 11. Today, SMF is recognized worldwide for its ongoing work in setting, maintaining and continually upgrading the most authoritative helmet standards in the United States and throughout the world. SMF tests thousands of helmets each year and maintains its objectivity by remaining independent of helmet manufacturers, as well as of local and national governments.
- 12. Helmets meeting SMF's strict standards provide the highest level of protection available. Helmets standards set by SMF significantly surpass those set by the U.S. Department of Transportation (DOT), the American National Standards Institute (ANSI), the American Society of Testing Materials (ASTM) and the U.S. Consumer Products Safety Commission.
- 13. To continuously monitor the quality of helmets being sold to the public, SMF purchases and tests samples of currently certified helmets from the marketplace. These helmets are tested only in SMF labs by SMF technicians.

- 14. Since at least as early as 1978, long prior to the infringing acts of Defendants alleged herein, SMF has continuously authorized the use of the certification mark SNELL (and similar marks) in commerce in the United States, including in the State of New York and in this judicial district, in connection with the identification of helmets certified by SMF.
- 15. Only helmets meeting SMF's exacting standards can bear the SNELL certification mark and can be marked with the SNELL certification. Before a helmet can be certified, it is tested in SMF's state-of-the-art test facility. SMF's technicians conduct a variety of tests to determine the helmet's performance and ability to perform effectively in different environmental conditions. Depending on the application and the standard, each helmet must pass many rigorous tests including, without limitation, impact tests, positional stability (roll off) tests, dynamic retention tests, chin bar tests, shell penetration tests, face shield penetration tests and flame resistance tests.
- 16. Due to the importance of helmet safety and the inability of consumers to determine the relative safety of a particular helmet, consumers rely on SMF and the SNELL certification when purchasing helmets to ensure that those helmets meet certain safety standards.
- 17. SMF has invested many millions of dollars and has expended significant time, effort and resources in connection with setting, maintaining and continually upgrading the most authoritative helmet standards as well as testing and certifying helmets in the U.S. and throughout the world. As a result of such activities, SMF has established substantial goodwill and widespread recognition in its SNELL certification mark, and the mark has become associated exclusively with SMF by manufacturers, retailers, retail customers and potential customers, as well as by the general public at large.

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- 18. To create and maintain such recognition among helmet consumers, SMF has taken substantial steps to ensure that helmets certified as SNELL meet the strictest safety standards.
- 19. The SNELL certification mark is an extremely important and valuable asset to SMF, and, as such, SMF vigorously enforces its rights in and to the SNELL mark. Any unauthorized third party use of the SNELL mark could potentially constitute a public health risk since consumers may mistakenly believe that certain helmets have met SMF's strict safety standards when, in fact, they have not.
- 20. As a result of, inter alia, the care and skill exercised by SMF in the course of testing, evaluating and certifying helmets as well as its widespread recognition, the SNELL mark has acquired secondary meaning in the United States, including in the State of New York.
- 21. In addition to meeting SMF's strict standards, all use of the SNELL mark by authorized third parties must also comply with the terms and conditions of SMF's limited license agreement for such use.
- 22. More specifically, SMF's standard license agreement requires that authorized third parties who wish to promote and/or advertise their products using the SNELL mark submit that advertising to SMF for its prior approval. Pursuant to the terms of that license agreement, when advertising helmets certified by SMF, authorized third parties may only use the SNELL mark in conjunction with certified models identified by appropriate brand names, model designations and sizes. Authorized third parties shall neither use the SNELL mark to refer to helmets that are uncertified, nor shall they suggest or imply in any way that uncertified helmets are SNELL certified.

23. SMF owns several United States Certification Mark registrations for its SNELL mark, including Registration No. 1,970,048 for the mark SNELL and Design which identifies "protective headgear" (the "'048 Registration") as well as Registration No. 924,033 for the mark SNELL MEMORIAL FOUNDATION which identifies "protective headgear" (the "'033 Registration"). The '048 and '033 Registrations are incontestable pursuant to 15 U.S.C. § 1065. Copies of SMF's registrations are attached as Exhibit 1.

Iron Horse, Helmets, Inc. and Sobel's Wrongful Conduct

- 24. In or about February 2008, SMF learned that Defendants Iron Horse and Sobel were operating a website with the infringing domain name, snellhelmets.com. Defendants Iron Horse and Sobel used and registered the snellhelmets.com domain name despite the fact that SMF never authorized Defendants to use the infringing name in a website, and further despite the fact that that none of the helmets on the webpage are SMF certified helmets and none displays the brand name, model number and size of the helmet as required for the listing of certified helmets. Additionally, on the top of the opening page of the snellhelmets.com website, without any reference to a particular helmet model, the words "SNELL MOTORCYCLE CERTIFIED HELMETS" appeared. The words "Snell Motorcycle Helmets" appeared in large, red letters and the word "Certified" appeared in smaller white letters. The snellhelmets.com website also featured a link on the left side of the page to "Snell Helmets." Clicking on that link revealed a new page displaying many helmets that were either not SMF certified or did not display the brand name, model number and size of the helmet as required. Attached as Exhibit 2 is a printout from the original version of the snellhelmets.com website.
- 25. Immediately after learning of Defendants Iron Horse's and Sobel's infringement, on February 8, 2008, SMF, through its counsel, sent a letter to Defendant Iron Horse demanding

that, among other things, Iron Horse immediately cease and desist all further use of the SNELL mark and transfer all rights in the snellhelmets.com domain name to SMF.

- 26. In a letter dated February 13, 2008, through its counsel, Iron Horse refused to cease and desist its infringing activities. Instead, and to SMF's surprise, Iron Horse indicated that it would be willing to "entertain reasonable offers" for SMF to purchase the snellhelmets.com domain name.
- 27. Subsequent to additional correspondence between the parties and subsequent attempts to resolve this matter amicably, Defendants Iron Horse and Sobel agreed to cease offering for sale helmet products directly on the snellhelmets.com website. However, Iron Horse and Sobel maintained their refusal to transfer ownership of snellhelmets.com to SMF. In addition, Iron Horse and Sobel refused to take down the snellhelmets.com website in its entirety and, instead, began using the website to promote and link to other helmet retail and wholesale websites and businesses owned or operated by Iron Horse and Sobel, and others. Among other things, this present version of the website incorporates a link to Defendant Iron Horse's website, ironhorsehelmets.com, and Defendant Helmets, Inc.'s website, helmetsinc.com, together with the phrase "Snell Approved Helmets." Defendants use this phrase despite the fact that Iron Horse and Helmets, Inc. do not sell SMF certified helmets and do not display the brand name, model number and size of the helmet as required. Attached as Exhibit 3 is a printout from the current version of the snellhelmets.com website.
- 28. In addition to the infringing use of the SNELL certification mark on the snellhelmets.com website, SMF also learned that Defendants Iron Horse, Helmets, Inc. and Sobel are infringing SMF's SNELL mark on the websites ironhorsehelmets.com and helmetsinc.com. Specifically, both of those websites feature links entitled "Snell Helmets."

- 29. In addition, defendants are also infringing the SNELL certification mark by imbedding the SNELL mark into the metatags of their websites snellhelmets.com, ironhorsehelmets.com and helmetsinc.com. As a result, consumers or the general public who perform an Internet search for the terms "Snell" or "Snell Helmets" on Internet search engines may be mistakenly directed to Defendants' websites. In fact, when a search of the terms "Snell Helmets" is entered into the Google search engine, the Defendants' snellhelmets.com website is the first website to appear - even before SMF's website. Attached as Exhibit 6 is a printout from the Google search engine showing the link to the snellhelmets.com website when "Snell Helmets" is entered.
- 30. As a result of defendants' improper conduct, consumers who perform Internet searches for "Snell Helmets" are likely to be mistakenly directed to Defendants' websites and to helmet products sold by Defendants which are not certified by SMF.
- 31. Defendants have adopted and/or are using the SNELL mark and the snellhelmets.com domain name with the intent to trade off on the recognition and good will that

SMF has earned in its SNELL certification mark and to deceive and confuse the public into believing that all products Defendants sell are certified, tested or otherwise approved by SMF.

32. The Infringing Mark and the Infringing Domain Name are confusingly similar to SMF's SNELL mark, and Defendants used and are using the Infringing Mark and the Infringing Domain Name in connection with helmet products - the very same products certified, tested and evaluated by SMF.

FIRST CLAIM FOR RELIEF

(Trademark Infringement and Unfair Competition under the Lanham Act, 15 U.S.C. § 1114(a))

- 33. SMF repeats and realleges the allegations set forth above.
- 34. This claim arises under the trademark laws of the United States, 15 U.S.C. § 1051 et. seq., and, specifically, 15 U.S.C. § 1114(a), and is to remedy acts of trademark infringement and unfair competition by Iron Horse, Helmets, Inc. and Sobel.
- 35. Without SMF's consent and long after the first use in commerce of SMF's registered SNELL certification mark, Defendants began using and continue to use in commerce the SNELL mark on or in connection with the identical or closely related goods and services.
- 36. Defendants' use in commerce of the registered SNELL certification mark is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of Defendants with SMF and is likely to cause confusion as to the origin, sponsorship, certification or approval of Defendants' goods by SMF and, therefore, constitutes trademark infringement in violation Section 32(a) of the Lanham Act, 15 U.S.C. § 1114(a).
- 37. As a direct and proximate result of Defendants' infringing activities, SMF has suffered substantial damage and is entitled to an injunction and to recover Defendants' profits, all

damages sustained by SMF, and the cost of this action under 15 U.S.C. § 1117(a), which amounts are yet to be determined.

- 38. Defendants' actions as alleged herein have been committed willfully and with the intent to profit from SMF's rights in its SNELL mark. As a result, this is an exceptional case and SMF is entitled to recover enhanced damages, costs and its reasonable attorneys' fees pursuant to 15 U.S.C. §§1117(a) and (b).
 - 39. SMF is also be entitled to statutory damages pursuant to 15 U.S.C. §§1117(c).
- 40. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

SECOND CLAIM FOR RELIEF

(Cybersquatting Under the Lanham Act, 15 U.S.C. § 1125(d))

- 41. SMF repeats and realleges the allegations set forth above.
- 42. Defendants have registered, trafficked in and/or used the domain name snellhelmets.com, which is identical or confusingly similar to SMF's SNELL trademark, and which was distinctive at the time Defendants registered the domain name.
- 43. Upon information and belief, Defendants registered the snellhelmets.com domain name in bad faith and with the intent to profit from SMF's goodwill in its SNELL certification mark.
- 44. As a direct and proximate result of such conduct, SMF has suffered, and will continue to suffer, monetary loss and irreparable injury to its business, reputation and goodwill.
- 45. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

THIRD CLAIM FOR RELIEF

(Trademark Dilution Under the Federal Anti-Dilution Statute 15 U.S.C. § 1125(c))

- 46. SMF repeats and realleges the allegations set forth above.
- 47. SMF's registered SNELL certification mark is famous and distinctive by virtue of, *inter alia*, its registration with the United States Patent and Trademark Office, its inherent distinctiveness, the longstanding use of the mark in commerce and its extensive recognition amongst consumers and the public at large as representing rigorous helmet testing standards.
- 48. Defendants have intentionally, deliberately and willfully used in commerce a mark which is likely to cause confusion with SMF's famous and distinctive SNELL mark.
- 49. Defendants' intentional, deliberate and willful trading on SMF's reputation through the unauthorized used of its famous and distinctive certification mark significantly undermines SMF's strict certification process and, therefore, has lessened the capacity of SMF's certification mark to identify and distinguish helmets which have been certified by SMF.
- 50. Defendants' actions, which were intentional, willful, deliberate and knowingly made, violate Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c), which will cause substantial and irreparable damage to SMF, and will result in Defendants' unjust enrichment and unlawful derivation of profits and gains.
- 51. As a result of Defendants' intentional, deliberate and willful actions, SMF has suffered and will continue to suffer irreparable injury, the exact nature and extent of which cannot be ascertained at this time, and for which there is not adequate remedy at law.
- 52. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

(Deceptive Acts and Practices Under N.Y. General Business Law §§ 349 and 350)

- 53. SMF repeats and realleges the allegations set forth above.
- 54. Defendants' use in commerce of the Infringing Mark and Infringing Domain

 Name in connection with the advertising and sale of the helmet products is intentionally

 deceiving and misappropriates, and is intended to misappropriate, the time, labor, reputation,

 expenditures and good will of SMF and constitutes deceptive acts and practices in violation of §

 349 and § 350 of the New York General Business Law.
- 55. As a direct and proximate result of Defendants' deceptive acts and practices, SMF is entitled to recover all damages sustained by SMF, which amount is to be determined.
- 56. Defendants' acts are, and always have been, willful and, therefore, SMF is entitled to increased damages and reasonable attorneys' fees.
- 57. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

FIFTH CLAIM FOR RELIEF

(Common Law Trademark Infringement)

- 58. SMF repeats and realleges the allegations set forth above.
- 59. By virtue of continuing to permit the use of the SNELL certification mark by authorized third parties who have met SMF's strict testing standards and who have agreed to abide by a license agreement, SMF has acquired common law rights in this mark.
- 60. Defendants use of marks identical and/or confusingly similar to SMF's SNELL certification mark infringes SMF's common law rights in its mark, and, as a result, Defendants'

use is likely to cause confusion, mistake, or deception among consumers, who will believe that Defendants' goods, web site and/or Internet domain name originate from, or are affiliated with, or endorsed, certified, or approved by SMF when, in fact, they are not.

- As a direct and proximate result of Defendants' infringement of SMF's common law trademark rights under New York and other common law, SMF has suffered, and will continue to suffer, monetary damages and irreparable injury to its business, reputation, and goodwill.
- 62. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

SIXTH CLAIM FOR RELIEF

(Common Law Unfair Competition)

- 63. The above acts by Defendants constitute infringement of SMF's SNELL certification mark, unjust enrichment, unfair competition and unfair business practices in violation of SMF's rights under New York common law. Defendants' conduct is contrary to honest practice in commercial matters and constitutes common law trademark infringement under New York common law.
- 64. Defendants' conduct harms both SMF and consumers at large, and as a result of Defendants' improper acts, SMF has suffered and will continue to suffer irreparable injury for which no adequate remedy at law exists.
- 65. Without injunctive relief, SMF has no means by which to control the continuing injury to its reputation and goodwill. SMF has been and will continue to be irreparably harmed. No amount of money damages can adequately compensate SMF if it lost the ability to control the

use of its mark, reputation and goodwill through the false and unauthorized use of its mark by Defendants.

66. Sobel directed, controlled, ratified, participated in and was the moving, conscious force behind all of the acts complained of herein.

PRAYER FOR RELIEF

WHEREFORE, SMF prays for judgment against Defendants jointly and severally as follows:

- A. For a preliminary and permanent injunction against Iron Horse, Helmets, Inc. and Sobel and their officers, agents, servants, employees, representatives, successors, and assigns, and all other persons, firms, or corporations in active concert or participation with them who receive actual notice of this Order, enjoining them from using the SNELL certification mark or any colorable imitation thereof, in any manner including, without limitation, on all websites controlled or operated by defendants and in the metatags of any such website which is likely to cause confusion or to deceive;
- B. For an Order that Iron Horse and Sobel transfer the snellhelmets.com domain name and all other similar domain names, to SMF;
- C. For an Order that Iron Horse, Helmets, Inc. and Sobel, within thirty (30) days after service of the Judgment demanded herein, be required to file with this Court and serve upon SMF's counsel a written report under oath setting forth in detail the manner in which they have complied with the Judgment;
- E. For an Order directing Iron Horse, Helmets, Inc. and Sobel to account to SMF for any and all profits derived by Iron Horse, Helmets, Inc. and Sobel from their sale of goods

bearing the SNELL certification mark and for all damages sustained by SMF by reason of the wrongful acts complained of herein;

- F. For an Order awarding statutory damages to SMF pursuant to 15 U.S.C. §§ 1117(c) and (d);
 - G. For an Order awarding SMF the amount of actual damages suffered;
 - H. For an Order awarding SMF treble the amount of actual damages suffered;
- I. For an Order awarding SMF its costs and disbursements incurred in connection with this action along with reasonable attorneys' fees;
- J. For any other damages or remedy to which SMF may be entitled, including all remedies provided for in 15 U.S.C. § 1117 and under New York law; and
 - K. For all such other relief as the Court may deem just and proper.

DEMAND FOR A JURY TRIAL

SMF demands trial by jury on all issues triable by a jury.

DATED: June 16, 2008

WOLFBLOCK LLP

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Attorneys for Plaintiff Snell Memorial Foundation, Inc.

Of Counsel:

Paul Appel, Esq. 277 Broadway, Suite 408 New York, New York 10007-2036

EXHIBIT 1

Prior U.S. Cl.: A

United States Patent and Trademark Office Reg. No. 1,970,048 Registered Apr. 23, 1996

CERTIFICATION MARK PRINCIPAL REGISTER



SNELL MEMORIAL FOUNDATION, INC. (CALIFORNIA CORPORATION)
P.O. BOX 493
7 FLOWERFIELD, SUITE 28
ST. JAMES, NY 11780

FOR: PROTECTIVE HEADGEAR, IN CLASS A (U.S. CL. A).

FIRST USE 9-13-1978; IN COMMERCE 9-13-1978.

OWNER OF U.S. REG. NO. 924,033.

THE CERTIFICATION MARK CONSISTS OF THE WORD "SNELL" IN STYLIZED LETTERS HAVING A SEMI CIRCLE ON THE "S" EX-

TENDING FROM TOP TO BOTTOM TO FORM THE SILHOUETTE OF A HELMET.

THE CERTIFICATION MARK AS USED BY PERSONS AUTHORIZED BY THE APPLICANT/CERTIFIER, CERTIFIES THE EXTENT OF ANATOMICAL PROTECTION AFFORDED BY THE HEADGEAR DESIGN, RESISTANCE TO PENETRATION, SHOCK ABSORPTION CHARACTERISTICS AND THE ADEQUACY OF CHIN STRAP HARNESSES.

SER. NO. 74-682,327, FILED 5-31-1995.

LINDA E. BLOHM, EXAMINING ATTORNEY

United States Patent Office

924,033 Registered Nov. 16, 1971

PRINCIPAL REGISTER **Certification Mark** (Goods)

Ser. No. 363,102, filed June 18, 1970

SNELL MEMORIAL **FOUNDATION**

Snell Memorial Foundation, Inc. (California corporation) 2315 Stockton Blvd. Sacramento, Calif. 94817

For: PROTECTIVE HEAD GEAR, in CLASS A. First use in about February 1959; in commerce in about February 1959.

Applicant disclaims the words "Memorial Foundation"

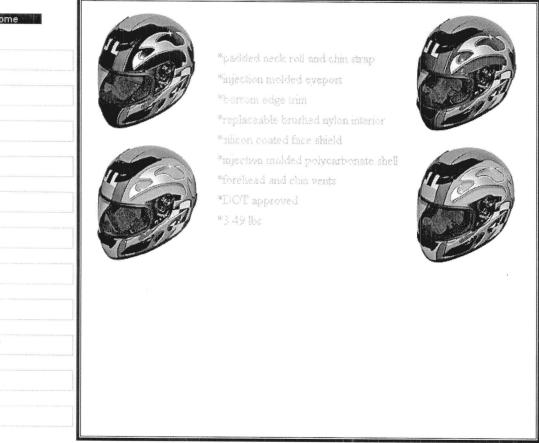
apart from the mark.

The mark certifies performance including adequacy of chin strap harness, extent of anatomical protection afforded by headgear design, resistance to penetration and shock absorption characteristic.

EXHIBIT 2



Snell Motorcycle Certified Helmets



Special Note to Motorcycle Helmet Users about Snell Standards:



EXHIBIT 3

www.snellhelmets.com

Snell Approved Helmets 10 years in business, top brands, Caliber, Rodia, THH & motorcycle gear. www.ironhorsehelmets.com

Chopper Motorcycle Helmets Save Cash on Chopper Helmets! www.chopperhelmets.com

Dot Certified Helmets International leader in retail/wholesale motorcycle helmet sales/supplier! www.FrenchysHelmets.com

Novelty Motorcycle Helmets In Stock & Ready to Ship Today! Free Returns www.choppersupply.com

Wholesale Motorcycle Helmets Wholesale only supplier of Motorcycle Helmets! www.helmetsinc.com

Motorcycle Helmets DOT motorcycle helmets starting at \$29.00. Several styles available. www.HelmetsGoneWild.com

EXHIBIT 4



We Only Do Helmets 800-978-9468

Home Motorcycle Helmets

- o Motorcycle Helmets
- o Motocross Helmets
- o Novelty Helmets
- o Kids Helmets
- o Airbrush Helmets
- o Full Face Helmets
- o Snell Helmets
- o Modular Helmets

All Motorcycle Helmets Riding Gear

Motorcycle Helmet Stickers

Info

Shopping Cart

Motorcycle

All Helmets

Motorcycle Helmets

Motocross Helmets

Novelty Helmets

Kids Motorcycle Helmets

Airbrushed Helmets

Full Face Helmets

Snell Motorcycle Helmets

Modular Helmets

Motorcycle Helmet Accessories

Motorcycle Helmet Mohawks

Motorcycle Helmet Spike Strips

Motorcycle Helmet

Holders

Motorcycle Helmet Quick Releases



- · All Motorcycle
- Helmets
- Motocross Helmets
- Novelty Helmets
- Kids Helmets
- · Airbrush Helmets
- SNELL Helmets

Neoprene Face Mask



- All Novelty Motorcycle Helmets
- German Novelty Motorcycle Helmets
- Chrome Novelty Motorcycle Helmets
- Gloss Novelty Motorcycle Helmets
- Matte Novelty Motorcycle Helmets
- Jockey Novelty Motorcycle Helmets
- · Carbon Fiber Motorcycle Helmets
- Colored Novelty Motorcycle Helmets
- Spiked Novelty Motorcycle Helmets

Riding Gear Motocross Goggles Motorcross Chest Plates Neoprene Face Masks Iron Horse Helmets Tshirt Information Company Info Contact Us Privacy Policy

Return Policy

Sizing Chart

Site Map





- All Motorcyle Helmet Stickers
- Dirty Motorcyle HelmetStickers
- Clean Motorcyle Helmet Stickers
- · Christian Motorcyle Helmet Stickers
- · Motorcyle Helmet Stickers For Him
- Motorcyle Helmet Stickers For Her
- Motorcyle Helmet Stickers for Veterans

DOT and NOVELTY MOTORCYCLE HELMETS

Iron Horse Helmets is THE BEST source on the web for all types motorcycle helmets. We feature DOT motorycle helmets, novelty motorcycle helmets, and Snell Motorcycle helmets. Our airbrushed novelty motorcycle helmets all feature custom artwork done onsite.

Our 2008 line of Motorcycle Helmet Stickers features Motorcycle Helmet Stickers for Him, Her, Christians, Veterans and Perverts. All of our airbrushed motorcycle helmets are airbrushed by hand, right here in the USA. You can be sure that a motorcycle helmet form Iron Horse Helmets is a brand new motorcycle helmet.

Have you seen our new winter line of Neoprene Face Masks?

We are add more motorcycle helmets every week, so be sure to check back and see our new designs!

We want Iron Horse Helmets to become your source for all your motorcycle helmet needs.



We believe in keeping our prices of our motorcycle helmets low. To do this, we are strict to our Policy: NO REFUNDS. EXCHANGES ONLY

- Home
- Motorcycle Helmets
 - o Eagle Flag Blck DOT Motorcycle Helmets
 - o Silver Eagle Flag DOT Motorcycle Helmet
 - FIRE FLAME DOT MOTORCYCLE HELMET

- CHROME FLAME DOT MOTORCYCLE HELMET
- o Black Flame DOT Motorcycle Helmet
- o Flame DOT Motorcycle Helmet
- Black DOT Motorcycle Helmet
- Flat Black DOT Motorcyle Helmet
- BLUE CROSS DOT MOTORCYCLE HELMET
- PURPLE CROSS DOT MOTORCYCLE HELMET
- BONE YARD PURPLE DOT Motorcycle Helmet
- o BONE YARD RED DOT Motorcycle Helmet
- o BONE YARD PINK Motorcycle Helmet
- BONE YARD BLACK DOT Motorcyle Helmet
- IRON CROSS BLACK DOT MOTORCYCLE HELMET
- CHROME FLAME GLOSS DOT Motorcycle Helmet
- BLUE TRIBAL FLAME DOT Motorcycle Helmet
- o Silver Tribal Flame DOT Motorcycle Helmet
- o Red Tribal Flame DOT Motorcyle Helmet
- o Wine Shorty DOT Motorcycle Helmet
- o Silver Shorty DOT Motorcycle Helmet
- o Leather Shorty DOT Motorcycle Helmet
- Pearl White Vented DOT Motorcyle Helmet
- BLACK VENTED DOT MOTORCYCLE HELMET
- BLACK ROSE DOT Motorcycle Helmet
- WHITE ROSE DOT Motorcycle Helmet
- o Silver Rose DOT Motorcycle Helmet
- o Powder Pink DOT Motorcyle Helmet
- Ladies Leopard DOT Motorcycle Helmet
- Alien Design Shorty DOT Motorcycle Helmet
- Skull Blade DOT Motorcycle Helmet
- 300 Explorer DOT Certified Motorcycle Helmet
- Matte Black & Orange DOT Motorcycle Helmet
- o Matte Black & Silver Vented DOT Motorcyle Helmet
- Matte Skull Flame DOT MOTORCYCLE HELMET
- Ghost Matte Flame DOT Motorcycle Helmet
- Vented Hawk DOT Motorcycle Helmet
- o Chrome DOT Motorcycle Helmet
- o Black Half Shell DOT Motorcyle Helmet
- White Half Shell DOT Motorcycle Helmet
- o Rebel Shorty DOT Motorcycle Helmet
- o Sull Pile DOT Certified Motorcycle Helmet
- o Carbon Fiber DOT Motorcycle Helmet
- Matte Black & Silver Vented DOT Motorcyle Helmet
- EX Wine DOT MOTORCYCLE HELMET
- EX Silver Rose DOT Motorcycle Helmet
- EX Black Rose DOT Motorcycle Helmet
- EX Flat Back DOT Motorcycle Helmet
- EX Pearl White White DOT Motorcyle Helmet
- EX Alien DOT Motorcycle Helmet
- o EX Boneyard Blue DOT Motorcycle Helmet
- EX BY Red DOT Motorcyle Helmet
- EX Gloss DOT Motorcycle Helmet
- DOT German Gloss Motorcycle Helmet

- o DOT German Flat Motorcycle Helmet
- BLACK MODULAR FULL FACE Motorcycle Helmet
- WHITE MODULAR FULL FACE Helmet
- Silver Modular Full Face Motorcycle Helmet
- Wine Modular Full Face Motorcycle Helmet
- Blue Snell Full Face Motorcycle Helmet
- o Green Snell Full Face Motorcycle Helmet
- Yellow Snell Full Face Motorcycle Helmet
- o Black Graphic Snell Full Face Motorcycle Helmet
- o Black Snell Full Face Motorcycle Helmet
- Black Full Face Motorcycle Helmet
- o Blue Full Face Motorcycle Helmet
- o Green Full Face Motorcycle Helmet
- Red Full Face Motorcycle Helmet
- Yellow Full Face Motorcycle Helmet
- o Black & Silver Full Face Motorcycle Helmet
- Silver 3/4 Shell DOT Motorcycle Helmet
- o Gloss Black 3/4 Shell DOT Motorcycle Helmet
- Wine 3/4 Shell DOT Motorcycle Helmet
- Matt Black 3/4 Shell DOT Motorcycle Helmet
- o Snell 3/4 Shell DOT Motorcycle Helmet
- Captain America 3/4 Shell DOT Motorcycle Helmet
- o Blue 3/4 Shell DOT Motorcycle Helmet
- Pink 3/4 Shell DOT Motorcycle Helmet
- o Red 3/4 Shell DOT Motorcycle Helmet
- o Black 3/4 Shell DOT Motorcycle Helmet
- Burgundy 3/4 Shell DOT Motorcycle Helmet
- White 3/4 Shell DOT Motorcycle Helmet
- Gray 3/4 Shell DOT Motorcycle Helmet
- Yellow 3/4 Shell DOT Motorcycle Helmet
- o 3/4 Shell DOT Motorcycle Helmet Shield
- o Full Face Motorcycle Helmet Shields
- Shorty Motorcycle Helmet Shields
- o All Motorcycle Helmets
- Riding Gear
- o Motorcycle Helmet Stickers
- o Info
- Shopping Cart



DOT Motorcycle helmets and Motorcycle helmet - Iron Horse Helmets

We Only Do Helmets 800-978-9468

Shopping Cart

Helmet Laws **Helmet Sizes**

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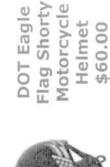
Page 1 of 12

Motorcycle DOT Eagle Flag Silver Helmet Shorty

\$60.00











Motorcycle Helmets

All Helmets

Motorcycle

Motocross Helmets

Novelty Helmets

http://ironhorsehelmets.com/motorcycle.htm

All Helmets Home

- o Motorcycle Helmets
 - o Motocross Helmets
 - o Novelty Helmets
- Airbrush Helmets o Kids Helmets 0
- o Full Face Helmets
 - o Snell Helmets
- o Modular Helmets

Motorcycle Helmets

Novelty Helmets Helmet Stickers Shopping Cart Riding Gear

Neoprene Face

\$70.00

Masks \$10.00

DOT Motorcycle helmets and Motorcycle helmet - Iron Horse Helmets

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Airbrushed Helmets full Face Helmets Modular Helmets Snell Helmets Kids Helmets

Motorcycle Helmet

Aotorcycle Helmet Johawks

Motorcycle Helmet Spike Strips

Motorcycle Helmet

Motorcycle Helmet Juick Releases Iolders

Riding Gear

Motorcross Chest Plates ron Horse Helmets Teoprene Face Masks Motocross Goggles shirt



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Motorcycle DOT Fire Helmet Shorty \$60.00 Flame



DOT Gloss Helmet \$65,00 Black

Motorcycle Helmet \$45.00 Shorty

Motorcycle DOT Blue Shorty Cross

Helmet \$70.00

Motorcycle DOT Bone Purple Shorty Yard

Helmet

\$65,00







Neoprene Face

Flame

DOTChrome Motorcycl Helmet Shorty



Motorcycle Helmet Shorty \$60.00



Motorcycle Helmet

Stickers

DOT P/B \$45.00 Cross

Motorcycle Helmet \$70.00 Shorty



Motorcycle Yard Red Helmet Shorty



\$65.00

http://ironhorsehelmets.com/motorcycle.htm

DOT Gloss

\$65.00

chrome

Flame

Masks \$10.00

Page 3 of 12







D.O.T. Wine

D.O.T. Red

Tribal

\$60.00

Price

Shorty Vented

\$60.00

T-Shirt \$10,00





Motorcycle

Shorty

Helmet

\$70.00 D.O.T.

Silver Tribal



D.O.T. Blue



Motorcycle

Flame

Tribal

Helmet

Motorcycle

Flame

Helmet

Price







Motorcycle

Flame

Helmet

Price

Motorcycle

Helmet

\$53.00

Price

\$60.00 Vented D.O.T. Shorty Silver

http://ironhorsehelmets.com/motorcycle.htm





Cross Black

DOT Iron

Motorcycle

Helmet

\$70.00







DOT Shorty Leather

Page 4 of 12

Helmet \$65 Motorcycle

Motorcycle

Helmet

Price

\$53.00





\$53.00

Neoprene Face Masks \$10.00



Gloss Black Motorcycle Helmet Vented Shorty \$53.00

DOT 200

Motorcycle DOT White Helmet Lady

Motorcycle DOT Pink Helmet \$65.00 Vented



Motorcycle

Lady

Helmet

\$65.00

DOT Silver

Motorcycle Leopard Helmet \$60.00 DOT















Motorcycle

Lady

Helmet

\$65.00

DOT Black



Motorcycle

Helmet

\$53.00

Vented

DOT White



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Chrome

Vented

DOT

Shorty









Motorcycle

Helmet

\$65.00

DOT Ghost





Motorcycle

Flame

Matte

Helmet

\$60.00

DOT

Skull Flame DOT Matte Motorcycle Helmet \$60.00



Motorcycle

Helmet

\$65.00

Motorcycle Helmet DOT 40 \$60.00 Hawk



Motorcycle Helmet \$65.00 Shell



Helmet \$65

Pile Vented

Shorty

DOT Skull

Motorcycle

Motorcycle

white 1/2

DOT 40

Motorcycle DOT Rebel Shorty

http://ironhorsehelmets.com/motorcycle.htm



Motorcycle

Helmet

DOT 300 Explorer DOT Matte

DOT Matte

\$65.00

Black &

\$60.00

Black &

Silver





Orange









DOT Motorcycle helmets and Motorcycle helmet - Iron Horse Helmets

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Motorcycle Helmet Stickers

Helmet

\$60.00

DOT BY Blue EX Helmet

Motorcycle

DOT EX

\$60.00 Gloss

DOT Alien Helmet

Motorcycle























Helmet \$65.00

Helmet

\$60.00

Page 6 of 12





Motorcycle

Look

Helmet \$70.00

Carbon

DOT

Motorcycle

Wine

Helmet

\$60,00

DOT EX



Rider Silver

DOT Lady

Rider Black

DOT Lady



Motorcycle

Helmet

\$70.00

Motorcycle

Helmet

\$70,00



DOT EX









Page 7 of 12



Motorcycle

Motorcycle

Gloss

Helmet

\$75.00

German

DOT

Helmet

\$75.00

German

DOT

Flat













Pearl White Motorcycle Full Face Modular \$129.00 Helmet DOT



Motorcycle Full Face Modular \$129,00 Silver Helmet DOT



Motorcycle Winebury Full Face Modular \$129.00 Helmet DOT

Motorcycle Full Face Modular Helmet Black DOT



\$129.00



SNELL/DOT

SNELL/DOT

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Motorcycle Helmet

DOT Full Face

Graphic 80 Green



SNELL/DOT

SNELL/DOT

Full Face

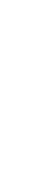
Yellow Blade T-Shirt \$10,00



Motorcycle

Helmet

\$100.00





SNELL/DOT Motorcycle Full Face \$100.00 Helmet Black



Motorcycle

Helmet

\$65.00

Face Black

DOT

707 Full





Motorcycle

Helmet

\$100.00

Full Face

Green Blade

Motorcycle Blue Blade Full Face \$100.00 Helmet





Graphic 80

Face

DOT Full

Page 9 of 12



Helmet \$80 Motorcyle



Helmet \$80 Graphic 80 Motorcyle DOT Full YellowG Face



Helmet \$80 Graphic 80 Motorcyle Face RedG

DOT Full



Shell Silver Motorcycle removable DOT 3/4 Helmet \$60.00 Visor with







Shell Black Motorcycle Helmet DOT 3/4



DOT 3/4 with

removable \$60,00 Visor



DOT Motorcycle helmets and Motorcycle helmet - Iron Horse Helmets

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SNELL/DOT

Black

3/4 Shell

Motorcycle

Black

Helmet

\$85.00

Visor





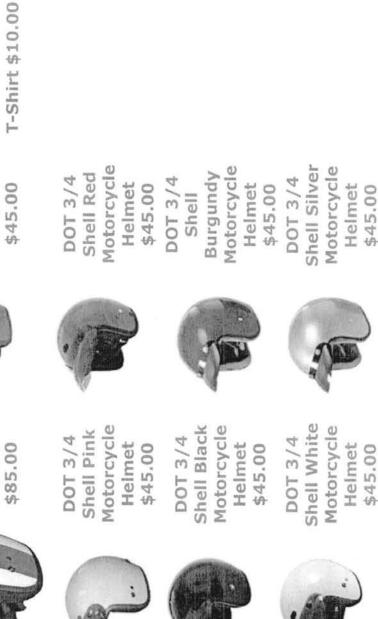
Helmet

Motorcycle

Helmet

America

Captain



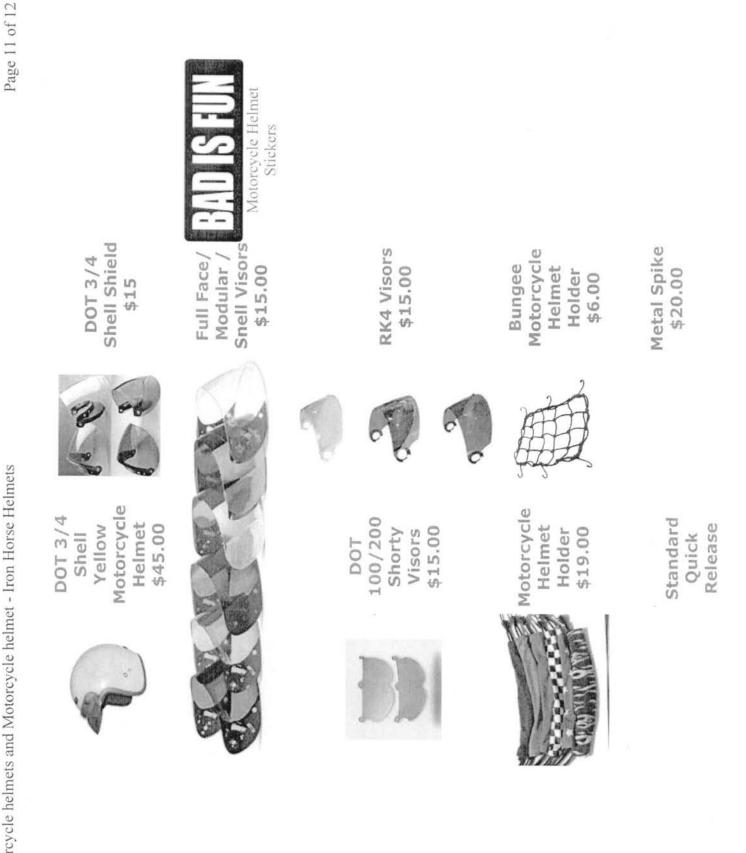
Motorcycle removable Shell Matt Helmet \$60.00





with







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\$5.00

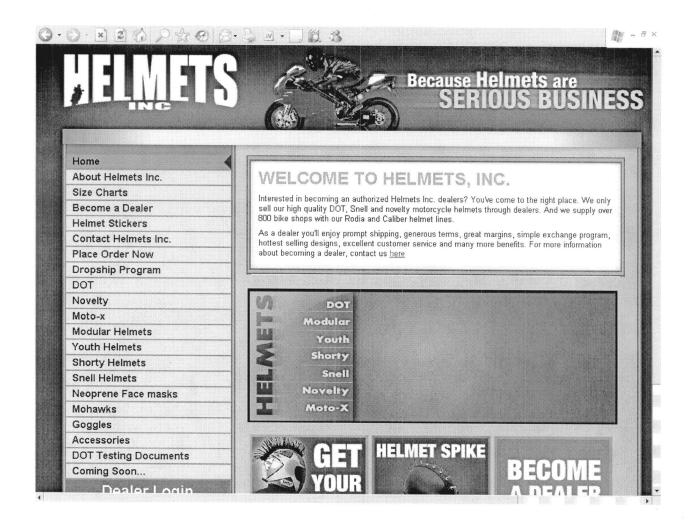




Neoprene Face Masks \$10.00

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EXHIBIT 5



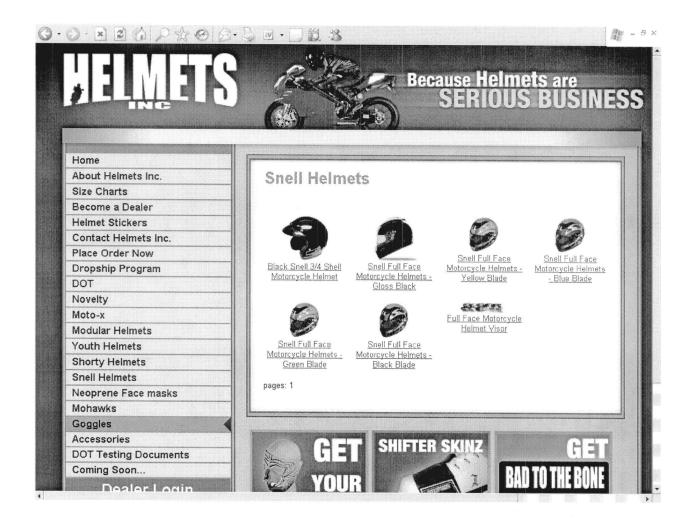


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Web Shopping Results 1 - 10 of about 401,000 for Snell Helmets. (0.28 seconds)

Snell Approved Helmets

20 years in business, top brands. HJC. Shoel www.Leatherup.com

THH & motorcycle gear

Shopping results for Snell Helmets

RCi Helmet Full Face Snell M Rated

\$119.99 -SoloRacer.com

Matt Snell New York Jets Autographed ...

\$71.99 - FansEdge

HAWK Snell/DOT Approved Black

\$79.95 -

See Snell Helmets results available through Google Checkout

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Snell Approved Helmets 10 years in business, top brands, Caliber, Rodia, THH & motorcycle gear. www.ironhorsehelmets.com · Chopper Motorcycle Helmets ...

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DOT helmet, Snell rated motorcycle helmets

DOT and Snell rated helmets from Helmet Outlet USA. www.helmetoutletusa.com/motorcycle/dot_snell_helmet.html - 6k -Cached - Similar pages

Snell Rated Motorcycle Helmets from Shoei, HJC, Nolan, KBC, Bieffe ...

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Auto Racing **Helmet** Brands All Premium Brands To Ensure Safety Unbeatable Selection, Browse Today! www.PitStopUSA.com/RacingHelmets

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Motorcycle Helmet Design, Helmet Standards and Head Protection ... All the Snell/DOT helmets we examined use a dual-density foam liner. Whether they think a Snell helmet is actually better at head protection or ... www.motorcyclistonline.com/gearbox/motorcycle_helmet_review/index.html - 163k - Cached - Similar pages

YouTube - Snell Helmet Testing with LabVIEW and CompactDAQ http://viroadshow.blogspot.com/The Snell Memorial Foundation works to make sure the helmets we use in transportation and sports are made according to the ... www.youtube.com/watch?v=DnA-OEeWitM - 57k - Cached - Similar pages

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To receive **Snell** certification, **helmets** are tested in four performance areas; ... In Other words, **Snell** tests the **helmet's** ability to shrug off all of the ... www.motor**helmets**.com/htm-service/resources-about-**snell**-table.htm - 71k - Cached - Similar pages

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